

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: Thomas & Mashelle Taylor)	CASE NO. 16-40053
)	
Debtors)	JUDGE KAY WOODS
)	
)	CHAPTER 13
)	
)	<u>OBJECTION TO CLAIM OF</u>
)	<u>UNITED CONSUMER FINANCIAL</u>
)	<u>SERVICES,</u>
)	<u>CLAIM #7 FILED 3-4-16</u>

FACTS

COME NOW, Thomas & Mashelle Taylor, (the "DEBTORS"), who for their objection to the claim filed by United Consumer Financial Services state the following:

1. Debtors filed for protection under Chapter 13 of Title 11 of the U.S. Code on January 14, 2016;
2. United Consumer Financial Services filed claim #7 on March 4, 2016 for participation in the payment of the plan in the sum of \$1,378.00 , secured.

BASIS FOR OBJECTION

Debtors object to the claim for the reason that the collateral, a Kirby Cleaning System, has a value of \$300.00.

RELIEF REQUESTED

WHEREFORE, Debtors respectfully ask that the claim of United Consumer Financial Services in the amount of \$1,378.00, secured not be paid as filed; instead, Debtors respectfully ask that this Court issue an Order instructing the Trustee to pay the claim as secured in the amount of \$300.00 and the balance to be paid as a general unsecured claim.

Respectfully submitted,

ROBERT A. CIOTOLA CO., L.P.A.

/s/ Robert A. Ciotola
ROBERT A. CIOTOLA (#0012487)
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NOTICE

The attached will be scheduled for consideration by the Court without the need for a further hearing. Any party in interest may request a hearing within thirty (30) days after filing of the objection. Unless a hearing is set by the Court or its specifically requested by one of the parties in interest by use of a cover letter attached to the front of the Objection or by a responsive pleading to the Court thirty (30) days after the filing of the original Objection or responsive pleading. The Court then will consider the Objection on the papers filed.

/s/Robert A. Ciotola
ROBERT A. CIOTOLA

CERTIFICATE OF SERVICE

I certify that on April 20, 2016, a true and correct copy of the foregoing Objection was served:

Via the Court's Electronic Case Filing System on the U.S. Trustee, and these entities and individuals who are listed on the Court's Electronic Mail Notice List:
Patti H. Bass, on behalf of United Consumer Financial Services at ecf@bass-associates.com;
Michael A. Gallo, on behalf of the Chapter 13 Trustee's office at mgallo@trustee.com,
mgallo@ecf.spiqsystems.com;

And by regular U.S. mail, postage paid, on:
Thomas & Mashelle Taylor, 1278 Erie Street, East Liverpool, OH 43920
United Consumer Financial Services, c/o Bass & Associates, P.C., 3936 E. Ft. Lowell, Ste. 200,
Tucson, AZ 85712;

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